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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
MOTORS LIQUIDATION COMPANY, : Case No. 09-50026 (MG)
:
Debtor. :
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**JOINDER OF GROMAN PLAINTIFFS TO MOTION FOR AN ORDER GRANTING
AUTHORITY TO FILE LATE CLASS PROOFS OF CLAIM**

Dr. Steven Groman, Robin DeLuco, Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus Sullivan, Katelyn Saxson, Amy C. Clinton, and Allison C. Clinton, each individually and as a putative class representative on behalf of all similarly situated persons (collectively, the “Groman Plaintiffs”), by and through their undersigned counsel, hereby join in the *Motion for an Order Granting Authority to File Late Class Proofs of Claim* [Dkt. No. 13806] (the “Motion”) as follows:

1. The Groman Plaintiffs are “Ignition Switch Plaintiffs” (as defined in the Motion) and have commenced an action against General Motors LLC (“New GM”) in United States District Court.
2. Additionally, on or about April 21, 2014, the Groman Plaintiffs commenced an adversary proceeding against GM in this Court asserting a violation of due process and fraud on

the court, which is known as *Groman v. General Motors LLC*, Adv. Pro. No. 14-01929 (the “**Adversary Proceeding**”).

3. The Groman Plaintiffs join in the Motion solely with respect to the proposed proof of claim to be filed on behalf of Ignition Switch Plaintiffs, which is annexed as Exhibit A to the Motion.

4. The Groman Plaintiffs reserve all rights, including, but not limited to, with respect to the Adversary Proceeding.

Dated: New York, New York
January 4, 2017

**WOLF HALDENSTEIN ADLER
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